

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Creedon Controls, Inc., a Delaware corporation,)
Plaintiff,) C. A. No. 05CV300 (JJF)
v.)
Banc One Building Corporation, an Illinois)
corporation; and Forest Electric Corporation, a)
New York corporation,)
Defendants.)

NOTICE OF DEPOSITION

TO: Paul A. Bradley, Esquire
McCarter & English, P.A.
919 N. Market Street, Suite 1800
P. O. Box 111
Wilmington, DE 19899

Lawrence C. Ashby, Esq./Philip Trainer, Jr., Esq.
Ashby & Geddes
222 Delaware Avenue
P. O. Box 1150
Wilmington, DE 19899

PLEASE TAKE NOTICE that the undersigned will the oral deposition of Defendant **Forest Electric Corporation**, on Wednesday, January 11, 2006, at 10:00 a.m., at the offices of Cohen, Seglias, Pallas, Greenhall & Furman, P.C., at 1007 Orange Street, Suite 205, Wilmington, Delaware 19801. In accordance with Rule 30(b)(6), Defendant Forest Electric Corporation is to designate and produce one or more witnesses competent to testify, and provide information with respect to those issues and matters as set forth in the attached Exhibit "A."

Cohen, Seglias, Pallas, Greenhall & Furman, P.C.

Robert K. Beste, Jr., Esq. (ID #154)
1007 Orange St., Nemours Bldg., Suite 205
Wilmington, DE 19801
(302) 425-5089
Attorneys for Plaintiff

Date: 12/19/05
cc: Wilcox & Fetzer, Court Reporters
RKB/msj
(06894-0001)

EXHIBIT "A"

Exhibit to 30(b)(6) Notice of Deposition of Forest Electric Corporation

In accordance with Rule 30(b)(6), Defendant **Forest Electric Corporation** is requested to provide witnesses competent to testify with respect to the following issues and matters:

1. All discussions, negotiations, correspondence, and communication with regard to the formulation of any contract between Creedon Controls, Inc. and Banc One Building Corporation and/or Forest Electric Corporation, and which relate to the Banc One Core Data Center in Wilmington, Delaware;
2. All discussions, negotiations, correspondence, agreements and communications by and between Banc One Building Corporation and Forest Electric Corporation and/or its affiliates or subsidiaries, and with respect to the rights, responsibilities, and duties of the defendants and Plaintiff for the construction of the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
3. Any discussions, negotiations, or communications between this defendant and Tishman Construction Corp., or any of its subsidiaries and affiliates, relating to the contractual obligations of Tishman Construction Corporation, Banc One Building Corporation, and/or Forest Electric Corporation, relating to the Banc One Core Data Center in Wilmington, Delaware.
4. The nature and extent of the contractual obligations of Creedon Controls, Inc, with respect to the project known as "Banc One Core Data Center," in Wilmington, Delaware.
5. Whether Plaintiff, Creedon Controls, Inc., properly performed its obligations, pursuant to the agreements of the parties, with respect to the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
6. Whether Plaintiff, Creedon Controls, Inc., is alleged to have improperly performed its obligations pursuant to the agreements of the parties and with respect to the project known as the "Banc One Core Data Center," in Wilmington, Delaware; and the precise nature of any such alleged improprieties or improper performance.
7. The scheduling and coordination of the work to be performed and materials supplied by Creedon Controls, Inc., at the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
8. The nature, extent and manner of the scheduling and coordination of trades, contractors, and other parties, for the completion of the various stages of the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
9. The nature of any claims of persons or entities, including other sub-contractors on the project, that the project known as the "Banc One Core Data Center," in Wilmington, Delaware was improperly managed, scheduled or coordinated.

10. The nature of any claims of governmental entities, that the project known as the "Banc One Core Data Center," in Wilmington, Delaware was improperly managed, scheduled or coordinated.
11. The persons or entities responsible for any delays or improper scheduling or coordination of the project known as the " Banc One Core Data Center" in Wilmington Delaware.

RKB/msj; 06894-0001

CERTIFICATE OF SERVICE

I, Robert K. Beste, Jr., Esquire, do hereby certify that on the 19 day of December, 2005, two (2) true and correct copies of the attached Notice of Deposition (of Forest Electric Corporation), were provided to the following, via electronic filing:

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McCarter & English, P.A.
919 N. Market Street, Suite 1800
P. O. Box 111
Wilmington, DE 19899

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Ashby & Geddes
222 Delaware Avenue
P. O. Box 1150
Wilmington, DE 19899

**COHEN, SEGLIAS, PALLAS,
GREENHALL & FURMAN, P.C.**


Robert K. Beste, Jr., Esq. (I.D. No. 154)
1007 Orange Street
Nemours Building, Suite 205
Wilmington, DE 19801
(302) 425-5089
Attorney for Plaintiff, Creedon Controls, Inc.

Dated: 12/9/05

RKB/msj
06894-0001